

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:19CR438
	:	
Plaintiff,	:	
	:	JUDGE DONALD C. NUGENT
vs.	:	
	:	
ANTOINE BELL, JR.,	:	<u>ANTOINE BELL'S SENTENCING</u>
	:	<u>MEMORANDUM</u>
Defendant.	:	

Antoine Bell submits this sentencing memorandum in support of his request for a sentence of at the low end of his guidelines range, with recommended mental-health and substance-abuse treatment.

Mr. Bell is 27 years old. None of his offenses have been violent crimes. His longest sentence has been 12 months. His advisory guidelines range of 100 to 125 months in prison is significantly longer than his prior times in custody. *See* PSR ¶¶ 32-38.

Mr. Bell has pleaded guilty to several drug offenses and to possessing a firearm and ammunition after a felony conviction. He accepts responsibility for his actions and recognizes that he faces a significant sentence. *See* PSR ¶¶ 2, 17. He also recognizes that he could benefit from mental-health and substance-abuse treatment. *See* PSR ¶¶ 52, 57.

This is a case where the Court can satisfy the purposes of sentencing without imposing a lengthy prison term beyond the low end of the guidelines range. Mr. Bell's prison term will be many times longer than his prior sentences, reflecting the seriousness of the offense, promoting respect for the law, and deterring criminal conduct. And by recommending treatment to address Mr. Bell's problems with substance abuse, impulse control, and lack of foresight, *see* PSR ¶ 53,

the Court can provide needed correctional treatment and help protect the public from additional crimes.

Respectfully submitted,

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